

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

NEW HAMPSHIRE INDONESIAN  
COMMUNITY SUPPORT, et al.,

*Plaintiffs,*

v.

DONALD J. TRUMP, President of the United  
States, in his official capacity, et al.,

*Defendants.*

Case No. 1:25-cv-38

**MOTION FOR THE ADMISSION, *PRO HAC VICE*, OF NOOR ZAFAR  
AS COUNSEL FOR PLAINTIFFS**

1. Pursuant to Rule 83.2(b) of the Local Rules of the United States District Court for the District of New Hampshire, New Hampshire Indonesian Community Support, League of United Latin American Citizens, and Make the Road New York (“Plaintiffs”) respectfully move this court for an order admitting Noor Zafar to the bar of this Court, *pro hac vice*, for the purpose of representing Plaintiffs in the above-captioned case. Ms. Zafar is knowledgeable regarding the dispute between the parties, and it would be economical and efficient to allow Ms. Zafar to appear before this Court.

2. Ms. Zafar is a member in good standing of the bars of New York, the U.S. District Court for the Southern District of New York, the U.S. Court of Appeals for the Second Circuit, the U.S. Court of Appeals for the Ninth Circuit, the U.S. Court of Appeals for the Tenth Circuit, and the U.S. Court of Appeals for the Eleventh Circuit; she is not suspended or disbarred in any jurisdiction or involved in any disciplinary proceedings; and she has never had *pro hac vice* status denied or revoked by any court. An affidavit attesting to these facts is attached.

3. For the foregoing reasons, Plaintiffs respectfully request that this Court grant this

motion and enter an order for admission of Ms. Zafar *pro hac vice* in the above-captioned case.

4. **Certificate of Concurrence:** Pursuant to Local Rule 7.1(c), undersigned counsel for Plaintiffs certify that Plaintiffs have made a good faith attempt to obtain concurrence in the relief sought. Plaintiffs sought concurrence on the evening of January 20, 2025 and had not yet obtained assent by the time of filing on the same date.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court:

A. Grant this Motion for Admission *Pro Hac Vice* of Noor Zafar; and

B. Grant such other and further relief as may be just and equitable.

Date: January 20, 2025

Respectfully submitted,

/s/ Gilles Bissonnette

Gilles R. Bissonnette (N.H. Bar No. 266657)

SangYeob Kim (N.H. Bar No. 266657)

Henry R. Klementowicz (N.H. Bar. No. 21177)

Chelsea Eddy (N.H. Bar No. 276248)

AMERICAN CIVIL LIBERTIES UNION OF NEW  
HAMPSHIRE FOUNDATION

18 Low Avenue

Concord, NH 03301

Tel. 603.224.5591

sangyeob@aclu-nh.org

gilles@aclu-nh.org

henry@aclu-nh.org

chelsea@aclu-nh.org

*Counsel for Plaintiffs*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

NEW HAMPSHIRE INDONESIAN  
COMMUNITY SUPPORT, et al.,

*Plaintiffs,*

v.

DONALD J. TRUMP, President of the United  
States, in his official capacity, et al.,

*Defendants.*

Case No. 1:25-cv-38

**AFFIDAVIT OF NOOR ZAFAR**

I, Noor Zafar, do hereby depose and swear as follows:

1. In accordance with Local Rule 83.2(b)(1)(A), I am an attorney at the American Civil Liberties Union Foundation, Inc. My office address is 125 Broad Street, 18th Floor, New York, NY 10004. My email address is nzafar@aclu.org, and my telephone number is (212) 549-2642.

2. In accordance with LR 83.2(b)(1)(B), the following are the courts in which I am admitted to practice, along with the years and dates of my admission.

<u>Court</u>	<u>Date of Admission</u>	<u>Bar Number</u>
New York Court of Appeals	May 16, 2018	5584701
U.S. District Court for the Southern District of New York	January 22, 2019	NZ7867
U.S. Court of Appeals for the Second Circuit	May 28, 2021	
U.S. Court of Appeals for the Ninth Circuit	September 27, 2021	
U.S. Court of Appeals for the Tenth Circuit	July 26, 2024	
U.S. Court of Appeals for the Eleventh Circuit	August 9, 2023	

3. In accordance with LR 83.2(b)(1)(C), I am a member in good standing and eligible to practice in the above-listed courts.

4. In accordance with LR 83.2(b)(1)(D), I am not currently and have never been suspended or disbarred in any jurisdiction.

5. In accordance with LR 83.2(b)(1)(E)(1), I have not been denied admission to practice before any court.

6. In accordance with LR 83.2(b)(1)(E)(2), I have not previously been disciplined by any court, nor am I subject to any pending disciplinary matters.

7. In accordance with LR 83.2(b)(1)(E)(3), I have not been convicted of any felony or misdemeanor crimes.

8. In accordance with LR 83.2(b)(1)(F), I have not been denied admission to practice before any court, and no court has denied or revoked my pro hac vice status.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Date: January 20, 2025

Respectfully submitted,

/s/ Noor Zafar

Noor Zafar

AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION

125 Broad Street, 18<sup>th</sup> Floor

New York, NY 10004

(212) 549-2642

[nzafar@aclu.org](mailto:nzafar@aclu.org)